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Member of the Firm

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August 12, 2024

BY ECF

Judge Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, NY 11201

Re: *SEC v. Xia, et al.*
21-cv-05350-PKC-RER

Dear Judge Chen:

I write in response to Mr. Hantman's letter of August 8, 2024. As I previously advised the court, my office is presently holding \$701,053.10 in its escrow account representing funds that my firm has not bill against -at this point- for services to Mr. Xia in a multitude of state and federal litigations as his and his companies' counsel. As I have previously confirmed with the Court, on my firm's motions, Meyer Suozzi was relieved a counsel in each of those matters with one exception. Specifically, in the matter of *S.E.C. v. Xia, et al.*, No. 21-cv-5350 (PKC) (RER) CTC, in which my firm appeared for defendants - since the action was stayed by the court some time ago- we did not make motion to be relieved as counsel in that case. I note that I will be making such a motion unless Mr. Hantman or some other counsel agree to take on the matter.

Insofar as Mr. Hantman's application is concerned, as I previously advised, Mr. Xia, Mr. Hantman and the Court, in the event that the Court orders that the December 8, 2022 asset freeze Order ("Asset Freeze Order") no longer applies to the funds I have in escrow, I will return those funds forthwith. However, the complete release will be subject to a discussion between my firm and Mr. Xia regarding amounts owing to my firm for services rendered that we did not withdraw from the escrow fund after the issuance of the Asset Freeze Order freezing those funds specifically.

I stand ready to discuss with Mr. Xia and his counsel a reasonable resolution in connection with the funds that remain due and owing to my firm, and potentially other counsel such as Mr. McCabe who weighed in on this matter in his August 9 letter to the Court, so that all concerned can move forward in the event that the funds in my firm's escrow account are removed from the Asset Freeze Order and considering the fact that Mr. Xia has reached a resolution with the SEC.

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Thank you for your consideration in this matter

Respectfully submitted,

s/Paul F. Millus

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PFM:sr

All Counsel of Record By ECF

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